

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

v.

TANDIA YOUNGER,

Defendant.

2:23-CR-20276

Judge Victoria A. Roberts

MG: Anthony P. Patti

Filed: 05/11/2023

Violation:

18 U.S.C. § 1594(c)

**Information**

The United States Attorney charges that:

**Count One**

**Conspiracy to Commit Sex Trafficking of a Minor  
18 U.S.C. § 1594(c)**

From in or around January 2020, through on or about February 2020, in the Eastern District of Michigan, and elsewhere, the defendant, TANADIA YOUNGER, conspired with Samuel “Sincere” McCoy, in and affecting interstate commerce, to knowingly recruit, entice, harbor, transport, provide, obtain, advertise and maintain by any means another person, namely JD and MH, knowing and in reckless disregard of the fact, and having reasonable opportunity to observe JD and MH, that JD and MH had not attained the age of 18 years and would be

caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1) and (c);

All in violation of Title 18, United States Code, Section 1594(c).

**Count Two**  
**Conspiracy to Commit Sex Trafficking of a Minor**  
**18 U.S.C. § 1594(c)**

In or around February 2020, in the Eastern District of Michigan, and elsewhere, the defendant, TANADIA YOUNGER, conspired with one or more persons, in and affecting interstate commerce, to knowingly recruit, entice, harbor, transport, provide, obtain, advertise and maintain by any means another person, namely MH, MB, and CP, knowing and in reckless disregard of the fact, and having reasonable opportunity to observe MH, MB, and CP, that MH, MB, and CP had not attained the age of 18 years and would be caused to engage in a

commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1) and (c);

All in violation of Title 18, United States Code, Section 1594(c).

DAWN N. ISON  
United States Attorney

/s/ Brandy R. McMillion  
Brandy R. McMillion  
Chief, General Crimes Unit

/s/ Thomas Franzinger  
Thomas Franzinger  
Assistant United States Attorney

Dated: May 11, 2023

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number
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**NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.**

<b>Companion Case Information</b>	Companion Case Number: 20-cr-20234
This may be a companion case based upon <b>LCrR 57.10 (b)(4)</b> <sup>1</sup> :	<b>Judge Assigned:</b> Terrence G. Berg
<input checked="checked" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>	<b>AUSA's Initials:</b> TF

**Case Title:** USA v. Tandia Younger

**County where offense occurred :** Wayne and Genesee

**Check One:**    ☒ **Felony**                      ☐ **Misdemeanor**                      ☐ **Petty**

☐ Indictment/ ☐ Information --- **no** prior complaint.  
☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 23-mj-30030]  
☐ Indictment/ ☐ Information --- based upon LCR 57.10 (d) [Complete Superseding section below].

## Superseding Case Information


**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

[illegible]

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

May 11, 2023  
Date

  
Thomas Franzinger  
Assistant United States Attorney  
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Detroit, MI 48226-3277  
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Attorney Bar #: DC1005000

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.